

EXHIBIT B

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION

PROTRADENET LLC

Plaintiff.

v.

PREDICTIVE PROFILES, INC.

Defendant.

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Consolidated
Civil Action No. 6:18-CV-38-ADA

PREDICTIVE PROFILES, INC.

Plaintiff.

v.

PROTRADENET LLC AND DWYER
FRANCHISING LLC,

Defendants.

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DECLARATION OF VICTOR C. JOHNSON ON ATTORNEY'S FEES

My name is Victor C. Johnson. I am one of the attorneys representing ProTradeNet LLC and Dwyer Franchising (collectively "Dwyer"), in the above-referenced lawsuit. I have been practicing law in this jurisdiction for more than 20 years. My practice is dedicated to business disputes, intellectual property, and other civil litigation, with an emphasis on intellectual property. I have handled a wide variety of intellectual property litigation cases for both plaintiffs and defendants, and am familiar with the standards in the Western District of Texas for reasonable and necessary attorneys' fees in cases of this nature. I also am familiar with the appropriate hourly rates for litigation of this type. This case is being handled on an hourly rate basis.

1. The discounted hourly rate of attorneys¹ who have worked on this case are as follows:
 - Victor C. Johnson average rate of \$545.00 per hour, and worked 154 hours; and

¹ Attorneys' CVs are attached as Exhibit 1.

- Amelia H. Marquis average rate of \$335.00 per hour and worked .8 hours.
2. In my opinion, these rates are reasonable for the case at bar, given the various complexities and issues involved. Moreover, these rates are comparable to the hourly rates of other counsel in this case at comparable levels of experience.
 3. Dwyer incurred \$84,719.04 in attorneys' fees devoting 154.8 hours of work beginning July 10, 2019.² None of those hours would have been necessary without Predictive Profiles, Inc.'s willful infringement, nor would they have been necessary had Predictive Profiles, Inc. abided by the contract and ceased using Dwyer's trademarks upon termination of the agreement. To add insult to injury, Predictive Profiles, Inc.'s litigation strategy caused Dwyer to incur attorneys' fees that otherwise would have been unnecessary, including but not limited to, violating the Court's Preliminary Injunction which required a Motion for Contempt.
 4. The actual amount billed in legal and professional fees related to legal services in this matter totals \$92,696.00. Of that amount, the Dykema firm provided Dwyer with a professional discount totaling \$7,976.96. The total amount billed to and payable by Dwyer in this matter is therefore \$84,719.04. This is the amount sought as a reasonable fee by the Dykema law firm.
 5. Dwyer's attorneys' fees for this type of case and in response to Predictive Profiles, Inc.'s handling of the case were reasonable and necessary, and Dwyer's counsel's hourly rates are customary for intellectual property litigation in Dallas. As the Attorney CV's (Exhibit 1) detail, the attorneys involved have extensive intellectual property experience, including the lead partner, Victor C. Johnson, who managed the case and proceeding.
 6. In our billings, we have given significant discounts to Dwyer in order to charge a reasonable rate. The reasonable value for the time worked on this case by lawyers of the law firm of Dykema Gossett PLLC is \$84,719.04.
 7. Assuming the case is appealed to the United States Court of Appeals for the Fifth Circuit, and Dwyer is successful, I estimate that a reasonable and necessary attorneys' fee to handle such an appeal would be \$100,000.00.
 8. In addition to the opinions expressed above, I am further of the opinion that it would be appropriate for the Court to award attorneys' fees to Dwyer based upon the factors established in *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714, 717-19 (5th Cir. 1974), and subsequent cases that have supported this analysis.

The Johnson factors include:

(1) the time and labor required; (2) the novelty and difficulty of the questions; (3) the skill requisite to perform the legal service properly; (4) the preclusion of other employment by

² See Exhibit 2 attached hereto. Exhibit 2 shows each attorney's time spent and rates.

the attorney due to acceptance of the case; (5) the customary fee; (6) whether the fee is fixed or contingent; (7) time limitations imposed by the client or the circumstances; (8) the amount involved and the results obtained; (9) the experience, reputation, and ability of the attorneys; (10) the “undesirability” of the case; (11) the nature and length of the professional relationship with the client; and (12) awards in similar cases. *See Johnson*, 488 F.2d at 717-9.

9. In regard to these factors, the time and labor required is evident from the attorney time records that are included as a part of this declaration. The novelty and difficulty of the questions involved in this case, and the skill required to perform the legal services properly, in my opinion, involve a high level of training and trial experience. In this regard, there was a significant amount of analysis and research related to the novelty of the trademark infringement claim made by Dwyer and the various causes of action and defenses.
10. Based upon the aforementioned *Johnson* factors, I believe that it is appropriate for the Court to award attorneys’ fees based upon the time spent and hourly rates discussed above.
11. In connection with my opinions, I have also considered the following factors, some of which are included in Rule 1.04 of the Texas Disciplinary Rules of Professional Conduct: (i) the time and labor involved; (ii) the novelty and difficulty of the questions involved; (iii) the skill requisite to perform the legal services properly; (iv) the likelihood that the acceptance of this matter will preclude me and others at this firm from other employment; (v) the fees customarily charged in this jurisdiction for similar legal services; (vi) the amount involved and the results sought; (vii) the time limitations imposed by the client or by the circumstances; (viii) the nature and length of the professional relationship with the client; and (ix) the experience, reputation and ability of the lawyer or lawyers performing the services.
12. A true and correct copy of the relevant time records from the Dykema Gossett PLLC firm concerning the time worked and expenses incurred to date in connection with this lawsuit is attached hereto as Exhibit 2. The records have been redacted in part to protect matters of privilege and/or confidentiality.

DATED: March 2, 2020

Respectfully submitted,

/s/ Victor C. Johnson

VICTOR JOHNSON

State Bar No. 24029640

vjohnson@dykema.com

DYKEMA GOSSETT

PLLC

1717 Main Street, Suite

4200 Dallas, Texas 75201

Telephone - (214) 462-6400

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And

JIM DUNNAM
State Bar No. 06258010
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ANDREA MEHTA
State Bar No. 24078992
andreamehta@dunnamlaw.com
DUNNAM & DUNNAM LLP
4125 West Waco Drive
Waco, Texas 76710
Telephone (254) 753-6437
Facsimile (254) 753-7434

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing document has been sent via the Court's electronic filing system to all counsel of record on March 2, 2020.

/s/ Victor C. Johnson
VICTOR C. JOHNSON

EXHIBIT 1

Victor C. Johnson

Member

Dallas

Comerica Bank Tower
1717 Main Street
Suite 4200
Dallas, TX 75201



T: 214-462-6477 vjohnson@dykema.com

Areas Of Practice

Intellectual Property
Intellectual Property Litigation
Trademark
Copyright
Privacy and Data Security

Industries

Dental Service Organizations
Industry Group
Insurance Industry Group
Insurance Related Litigation
Food & Beverage

Bar Admissions

Texas
Louisiana

Education

Loyola University New Orleans,
J.D., *cum laude*

- *Law Review* 1996-1998,
Editor 1997-1998

University of New Mexico, B.A.

Victor C. Johnson is a member of the Intellectual Property Practice Group in the Dallas, Texas office of Dykema. Mr. Johnson's practice focuses on IP litigation including patent, trademark, brand protection and trade secret misappropriation, as well as domain name disputes and other forms of unfair competition. He is also experienced in all aspects of complex commercial litigation and has significant experience in federal and state false claims act litigation. Mr. Johnson also has significant experience representing clients in whistleblower actions. Mr. Johnson has been the lead attorney on a wide variety of business litigation and intellectual property disputes for companies ranging in size from start-ups to Fortune 500 companies.

Immediately prior to joining Dykema, Mr. Johnson was a principal at a boutique litigation firm where he headed its IP Litigation and Brand Protection Group. He also spent 11 years with a large national intellectual property firm.

Representative Matters

IP CASES

ProTradeNet LLC v. Predictive Profiles Inc. (WDTX) - successfully defended client in week-long trial regarding TM infringement suit

360Mortgage v. Homebridge (WDTX) - successfully defended client in a week-long trial regarding IP dispute

Bose Corp. v. Vertigo Online (NDTX) - infringement action; obtained judgment of \$1.25 million and permanent injunction.

BMC Software v. CrabbyHacker.com (SDTX) - infringement action arising from the circumvention of measures that controlled access to copyrighted material; obtained civil search & seizure and with U.S. Marshalls conducted raid to seize evidence; obtained Consent Judgment of \$1 million and Permanent Injunction.

NDE Inc. v. Rainforest Creations (EDTX) - false advertising and misappropriation of business method case arising from the defendants' palming off of plaintiff's works; obtained \$4.7 million jury verdict.

Represented 3Ci in breach of contract and fraud action against another national architectural firm. Obtained a jury verdict in excess of \$4 million, including punitive damages.

Victor C. Johnson (Cont.)

Rodriguez v. Dallas Basketball Limited - represented Mark Cuban's Dallas Mavericks basketball team in class action litigation seeking more than \$100 million in damages. Case settled for less than 2% of claims.

U.S. Risk v. Lighthouse Programs, LLC - represented plaintiff in infringement case that resulted in \$5,500,000 jury verdict. Verdict was listed in the top 40 jury verdicts of 2009 by the Texas Lawyer.

Shaw v. Yahoo!, Microsoft and Real Networks - Obtained summary judgment for Yahoo! in suit alleging that Microsoft's and Real Network's multimedia applications, when used in combination with Yahoo!'s streaming media services, infringed the plaintiff's patent.

Represented banking client against infringement claims on several patents in the field of electronic check conversion. Case settled favorably shortly after trial began.

Alcatel USA, Inc. v. Tekelec, Inc. (EDTX) - Obtained a favorable settlement for Alcatel by asserting two patents related to the routing of query messages by a signal transfer point in a telecommunications network.

National Presort, Inc. v. Bell & Howell Company Postal Systems, Inc. (NDTX) - Obtained an extremely favorable settlement for Bell & Howell in defense of a patent infringement suit involving mail sorting technology.

Texas Instruments Incorporated v. Intergraph Corporation (EDTX) - Obtained a favorable settlement for TI by asserting three patents related to computer clock speed control and an intelligent power switch and defending against three patents related to parallel processing.

Whistleblower Cases

U.S. v. ResCare, Inc. (NDTX) - Whistleblower action under the False Claims Act seeking more than \$4.5 billion in damages. Case settled for less than 0.05 percent of the damages sought by the Government.

U.S. v. Driscoll Children's Hospital (SDTX) - Obtained summary judgment for a client hospital on allegations of federal False Claims Act (FCA) violations in a whistleblower action in which the United States had intervened. The United States alleged that the client committed fraud, violated the FCA, and otherwise obtained overpayments from the government relating to cost reimbursements from the Texas Medicaid program. Following the grant of summary judgment in favor of the client on all fraud and FCA claims, the remaining claims settled for substantially less than the projected cost of defense.

State of Texas v. Driscoll Children's Hospital - represented defendant against claims under federal False Claims Act case in a whistleblower action alleging over \$200,000,000 in damages. Case settled for a fraction of amount in controversy; hospital not required to submit to corporate integrity program.

United States of America, et al. v. Driscoll Children's Hospital, et al. - represented defendant against claims under False Claims Act case in a whistleblower action alleging fraud by the hospital in seeking reimbursement by the Texas Medicaid program. Following summary judgment in favor of the hospital on all False Claims Act and fraud claims, the case settled for less than 1% of the alleged damages of \$6,000,000.

U.S. v. UnitedHealth Group Incorporated (NDTX) - Represented insurance company on allegations of federal False Claims Act (FCA) violations in a whistleblower action. Conducted internal investigation, responded to document requests, and presented witnesses to government for interviews. Convinced government to decline intervention and obtained dismissal of suit.

U.S. v. Louisiana HomeHealth (WDLA) - Represented home-health care agency on allegations of federal False Claims Act (FCA) violations in a whistleblower action. Conducted internal investigation, responded to document requests and presented witnesses to government for interviews. Convinced government to decline intervention and obtained dismissal of suit.

U.S. v. University of Texas at Arlington (NDTX) - Represented university on allegations of federal False Claims Act (FCA) violations in a whistleblower action. Conducted internal investigation, responded to document requests and presented witnesses to government for interviews. Convinced government to decline intervention and obtained dismissal of suit.

In re Whistleblower (IRS) - represented confidential client as whistleblower of tax fraud to IRS. Client was credited for providing substantial assistance to the recovery of millions in back taxes and received substantial portion of the tax award.

Victor C. Johnson (Cont.)

Seminars & Speeches

Litigating Trade Secrets and Patents: When, Where, Who, Why and Other Questions You Were Afraid to Ask
July 23, 2019

Ethical Interactions with Judges On and Off the Bench, Dallas Bar Association
April 4, 2019

Emerging Issues in Trade Secrets Protection and Litigation
May 15, 2018

Building a Good Defense: Best Practices in Class Action Litigation, Moderator, Consero Corporate Litigation Forum
October 10, 2017

Trade Secrets: Protecting the Company's Crown Jewels in Litigation, Moderator, Consero Corporate Litigation Forum
October 9, 2017

Maximizing the Effectiveness and Impact of a Limited Anti-Counterfeiting Budget, 7th Annual Anti-Counterfeiting & Brand Protection East Coast
September 28, 2011

Ask the Experts: What Would You Do? 30 Answers in 30 Minutes Anti-Counterfeiting & Brand Protection West Coast
January 26, 2011

Publications

"West Texas Cements Its Place As Patent Hotbed"
February 26, 2020
Law360

"In His 1st Bench Trial, Judge Albright Awards \$3.6M In TM Suit"
February 24, 2020
Law360

"3D printing and its implications on copyright law"
May 2016
The Copyright Lawyer

"Third Circuit Expands Octane Fitness Standard to Trademark Cases"
September 25, 2014
SerendIPity

MPHJ Technology Investments LLC v. FTC: Fighting for Patent Owners' Rights in a Tide of Patent Reforms
August 29, 2014
Bloomberg BNA Patent, Trademark & Copyright Journal

"Understanding the Risks Associated With the Use of Virtual Currencies"
August 19, 2014
SerendIPity

"Understanding the Risks Associated With the Use of Virtual Currencies"
August 19, 2014
Association of Corporate Counsel

"Supreme Court Pulls the Plug on Aereo's Streaming TV Service Holding it Illegal"
June 26, 2014
SerendIPity

"The King is Dead - And Overruled"
September 19, 2011

"Fighting Online Counterfeiters at Internet Speed"
December 28, 2010

Victor C. Johnson (Cont.)

"New Indictment of In-House Counsel Indicates Enhanced Efforts to Hold Corporate Executives Accountable for Food and Drug Law Violations"
November 15, 2010

News

Record Attendance at Dykema's 5th Annual DSO Conference Noted in *DSO*News
September 13, 2018

Seven Dykema Attorneys Named "Best Lawyers in Dallas" by *D Magazine*
April 24, 2018

Victor Johnson Quoted in *Thomson Reuters Legal Solutions Blog* about Patent Venue Appeal
December 21, 2016

Aaron Charfoos, Victor Johnson and Dante Stella Quoted in *Inside Counsel*
March 4, 2015

Victor Johnson and Zachary Hoard Author Article on Virtual Currencies for *Metropolitan Corporate Counsel*
December 1, 2014

Dykema Intellectual Property Department Launches Blog
April 2, 2014

Dykema Intellectual Property Department Launches New Blog
March 27, 2014

Memberships & Involvement

State Bar of Texas

American Bar Association Intellectual Property Section

Intellectual Property In-House Counsel Group

Brand Enforcement IP Professionals

Intellectual Property Owners Association, Anti-counterfeiting and Privacy Committee, Member

Dallas Bar Association, Judiciary & Legal Ethics Committee, Member

Awards & Recognition

Recognized by *Texas Super Lawyers*® for IP Litigation, Civil Litigation: Defense and Business Litigation, 2014-Present

Recognized by *DMagazine* as a Best Lawyer for Intellectual Property, 2016 & 2018

Recognized by *DMagazine* in The Best Lawyers Under 40

Named a Rising Star by *Texas Monthly*

Named a Rising Star by *Law & Politics*, 2006-2008

Named top trademark litigation practitioner in Texas by *World Trademark Review 1000*

Amelia H. Marquis

Associate

Dallas

Comerica Bank Tower
1717 Main Street
Suite 4200
Dallas, TX 75201



T: 214-462-6426 amarquis@dykema.com

Areas Of Practice

Litigation
Business & Commercial
Financial Services Litigation –
Consumer
Government Investigations and
Corporate Compliance

Industries

Financial Industry Group

Bar Admissions

Texas

Court Admissions

U.S. District Court, Northern
District of Texas
U.S. District Court, Eastern District
of Texas
U.S. District Court, Western
District of Texas

Education

University of Oklahoma College of
Law, J.D., with honors, 2015

- Phi Delta Phi Legal Honor Society
- American Indian Law Review, Articles Editor, "Outstanding Comment"
- Century Scholar

Oklahoma Baptist University, B.A.,
cum laude, 2012

Amelia Marquis practices general commercial litigation as an associate in Dykema's Dallas, Texas office. Amelia's primary focus is on matters relating to financial services and business disputes. Amelia graduated with honors from the University of Oklahoma College of Law, and served as an Articles Editor for the American Indian Law Review. The law review selected her published student piece as "Outstanding Comment."

During law school, Amelia worked for all three branches of the federal government. She interned in Washington, D.C. with the United States House Committee on Agriculture and served as a legal extern for the United States Department of State in the Office of the Legal Adviser in International Claims and Investment Disputes. Amelia also worked as a judicial extern for the Honorable Judge Stephen P. Friot in the Western District of Oklahoma.

Publications

"Biometrics and the Fifth Amendment: A New Frontier"
February 2020
Law Journal Newsletters

Comment, "Sacred Rain Arrow: Honoring the Native American Heritage of the States While Balancing the Citizens' Constitutional Rights"
38 AM. Indian L.Rev. 501

Memberships & Involvement

- Dallas Bar Association
- Dallas Association of Young Lawyers
 - Leadership Class of 2016
 - Social Committee Member

Community/Civic Activities

- Dallas Pets Alive!

EXHIBIT 2



400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

DUE UPON RECEIPT

GRAYSON BROWN
GRAYSON BROWN, EXECUTIVE VP, GENERAL
COUNSEL & SECRETARY
NEIGHBORLY
1010 NORTH UNIVERSITY PARKS DRIVE
WACO, TX 76707

AUGUST 26, 2019
CLIENT-MATTER NO. 118295-000001
INVOICE NO. 3277235

FOR PROFESSIONAL SERVICES RENDERED

RE: PROTRADENET / PREDICTIVE PROFILES LAWSUIT - 2019-00216

FEES\$ 2,993.00

INVOICE TOTAL\$ 2,993.00



DWYER FRANCHISING, LLC
AUGUST 26, 2019

CLIENT-MATTER NO. 118295-000001
INVOICE NO. 3277235
PAGE 2

RE: PROTRADENET / PREDICTIVE PROFILES LAWSUIT - 2019-00216

DATE	ID	DESCRIPTION	HOURS
07/10/19	AHM	REVIEW AND ANALYZE FIFTH CIRCUIT PRECEDENT REGARDING CIVIL CONTEMPT FOR VIOLATION OF A PRELIMINARY INJUNCTION.	0.80
07/29/19	VCJ	WORK ON MOTION FOR CONTEMPT BRIEF	5.00
TOTAL ATTORNEY & PARALEGAL TIME			5.80
TOTAL LEGAL FEES			\$ 2,993.00



DWYER FRANCHISING, LLC
AUGUST 26, 2019

CLIENT-MATTER NO. 118295-000001
INVOICE NO. 3277235
PAGE 3

BILLING SUMMARY

ID	TIMEKEEPER	HOURS	RATE	AMOUNT
VCJ	VICTOR JOHNSON	5.00	545.00	2,725.00
AHM	AMELIA H. MARQUIS	.80	335.00	268.00
TOTAL		5.80		2,993.00



DWYER FRANCHISING, LLC
AUGUST 26, 2019

CLIENT-MATTER NO. 118295-000001
INVOICE NO. 3277235
PAGE 4

FEES \$ 2,993.00

INVOICE TOTAL \$ 2,993.00

Mailed Payments:

Dykema Gossett PLLC
Attn: Accounts Receivable
400 Renaissance Center
Detroit, MI 48243

Payment via ACH

Account Name: Dykema General
Bank: Huntington National Bank
Bank Address: 41 S. High Street (OP47)
City, State, ZIP: Columbus, OH 43215
Routing Number: 072403473
Account Number: 01388425607
Reference _____ (Invoice #)

Payment via Domestic Wire

Account Name: Dykema Gossett PLLC
Bank: Huntington National Bank
Bank Address: 41 S. High Street (OP47)
City, State, ZIP: Columbus, OH 43215
Routing Number: 044000024
Account Number: 01388425607
Reference _____ (Invoice #)

Payment via Foreign Wire

Account Name: Dykema Gossett PLLC
Bank: Huntington National Bank
Bank Address: 41 S. High Street (OP47)
City, State, ZIP: Columbus, OH 43215
Swift: HUNTUS33
Routing Number: 044000024
Account Number: 01388425607
Reference _____ (Invoice #)

Dykema's Tax Id Number: 38-1446628



400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

DUE UPON RECEIPT

GRAYSON BROWN
GRAYSON BROWN, EXECUTIVE VP, GENERAL
COUNSEL & SECRETARY
NEIGHBORLY
1010 NORTH UNIVERSITY PARKS DRIVE
WACO, TX 76707

SEPTEMBER 17, 2019
CLIENT-MATTER NO. 118295-000001
INVOICE NO. 3280776

FOR PROFESSIONAL SERVICES RENDERED

RE: PROTRADENET / PREDICTIVE PROFILES LAWSUIT - 2019-00216

FEES\$ 19,511.00

INVOICE TOTAL\$ 19,511.00



DWYER FRANCHISING, LLC
SEPTEMBER 17, 2019

CLIENT-MATTER NO. 118295-000001
INVOICE NO. 3280776
PAGE 2

RE: PROTRADENET / PREDICTIVE PROFILES LAWSUIT - 2019-00216

DATE	ID	DESCRIPTION	HOURS
08/05/19	VCJ	WORK ON MEDIATION STATEMENT AND MOTION TO ENFORCE.	5.00
08/06/19	VCJ	WORK ON MEDIATION STATEMENT AND MOTION TO ENFORCE.	5.00
08/06/19	VCJ	REVIEW AND EDIT CLAUSE RE TRADE DRESS.	1.20
08/08/19	VCJ	REVIEW AND EDIT MEDIATION STATEMENT.	1.20
08/11/19	VCJ	PREPARE FOR MEDIATION; DRIVE TO WACO.	2.10
08/12/19	VCJ	PREPARE FOR AND ATTEND MEDIATION; RETURN DRIVE TO DALLAS.	10.50
08/13/19	VCJ	RESEARCH FOR, WORK ON, AND EDIT TO MOTION FOR CONTEMPT/ENFORCE.	5.00
08/19/19	VCJ	REVIEW EXPERT REPORT OF DR. NORTH TO PREPARE FOR DEPOSITION; CONSULT WITH MR. DUNNAM'S OFFICE RE SAME.	1.10
08/20/19	VCJ	REVIEW EXPERT REPORT OF DR. NORTH; ATTEND PREPARATION MEETING WITH DR. NORTH; REVIEW AND EDIT MOTION SUMMARY JUDGEMENT.	4.00
08/22/19	VCJ	REVIEW EXPERT REPORT OF DR. NORTH; CONSULT WITH MR. DUNNAM RE POINTS OF REBUTTAL FOR DEPOSITION.	0.70

TOTAL ATTORNEY & PARALEGAL TIME 35.80
TOTAL LEGAL FEES\$ 19,511.00



DWYER FRANCHISING, LLC
SEPTEMBER 17, 2019

CLIENT-MATTER NO. 118295-000001
INVOICE NO. 3280776
PAGE 3

BILLING SUMMARY

ID	TIMEKEEPER	HOURS	RATE	AMOUNT
VCJ	VICTOR JOHNSON	35.80	545.00	19,511.00
TOTAL		35.80		19,511.00



DWYER FRANCHISING, LLC
SEPTEMBER 17, 2019

CLIENT-MATTER NO. 118295-000001
INVOICE NO. 3280776
PAGE 4

FEES \$ 19,511.00

INVOICE TOTAL \$ 19,511.00

Mailed Payments:

Dykema Gossett PLLC
Attn: Accounts Receivable
400 Renaissance Center
Detroit, MI 48243

Payment via ACH

Account Name: Dykema General
Bank: Huntington National Bank
Bank Address: 41 S. High Street (OP47)
City, State, ZIP: Columbus, OH 43215
Routing Number: 072403473
Account Number: 01388425607
Reference _____ (Invoice #)

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City, State, ZIP: Columbus, OH 43215
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Account Number: 01388425607
Reference _____ (Invoice #)

Payment via Foreign Wire

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Dykema's Tax Id Number: 38-1446628



DWYER FRANCHISING, LLC
SEPTEMBER 17, 2019

CLIENT-MATTER NO. 118295-000001
INVOICE NO. 3280776
PAGE 5

STATEMENT OF ACCOUNT

INVOICE DATE	INVOICE #	AMOUNT	PAYMENT	BALANCE DUE
08/26/19	3277235	2,993.00	.00	2,993.00
TOTALS		2,993.00	.00	2,993.00

Mailed Payments:

Dykema Gossett PLLC
Attn: Accounts Receivable
400 Renaissance Center
Detroit, MI 48243

Payment via ACH

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Account Number: 01388425607
Reference _____ (Invoice #)

Dykema's Tax Id Number: 38-1446628



400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

DUE UPON RECEIPT

GRAYSON BROWN
NEIGHBORLY
1010 NORTH UNIVERSITY PARKS DRIVE
WACO, TX 76707

NOVEMBER 13, 2019
MATTER #: 118295.000001
INVOICE #: 3291081

FOR PROFESSIONAL SERVICES RENDERED

RE: PROTRADENET / PREDICTIVE PROFILES LAWSUIT - 2019-00216

FEES	\$	18,530.00
DISBURSEMENTS		3.80
INVOICE TOTAL	\$	18,533.80



DWYER FRANCHISING, LLC
NOVEMBER 13, 2019

MATTER #: 118295.000001
INVOICE #: 3291081
PAGE 2

RE: PROTRADENET / PREDICTIVE PROFILES LAWSUIT - 2019-00216

DATE	ID	DESCRIPTION	HOURS
09/09/19	VCJ	RESEARCH AND WORK ON RESPONSE TO MOTION FOR SUMMARY JUDGMENT REGARDING INFRINGEMENT CLAIMS.	2.60
09/10/19	VCJ	RESEARCH AND WORK ON RESPONSE TO MOTION FOR SUMMARY JUDGMENT RE INFRINGEMENT CLAIMS.	2.90
09/11/19	VCJ	RESEARCH AND WORK ON RESPONSE TO MOTION TO STRIKE.	5.50
09/12/19	VCJ	RESEARCH AND WORK ON RESPONSE TO MOTION TO STRIKE; RESEARCH AND WORK ON RESPONSE TO MOTION FOR SUMMARY JUDGMENT RE INFRINGEMENT CLAIMS.	6.30
09/13/19	VCJ	RESEARCH AND WORK ON RESPONSE TO MOTION FOR SUMMARY JUDGMENT RE INFRINGEMENT CLAIMS.	8.50
09/16/19	VCJ	WORK ON RESPONSE TO MOTION TO STRIKE DR. NORTH; WORK ON FILING SAME.	8.20
TOTAL HOURS			34.00
TOTAL			\$18,530.00



DWYER FRANCHISING, LLC
NOVEMBER 13, 2019

MATTER #: 118295.000001
INVOICE #: 3291081
PAGE 3

BILLING SUMMARY

ID	TIMEKEEPER	HOURS	RATES	AMOUNT
VCJ	VICTOR JOHNSON	34.00	545.00	18,530.00
	TOTAL	34.00		\$18,530.00



DWYER FRANCHISING, LLC
NOVEMBER 13, 2019

MATTER #: 118295.000001
INVOICE #: 3291081
PAGE 4

DISBURSEMENTS

DATE	DESCRIPTION	AMOUNT
	PRINTING EXPENSES	3.80
	TOTAL DISBURSEMENTS	3.80



400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

GRAYSON BROWN
NEIGHBORLY
1010 NORTH UNIVERSITY PARKS DRIVE
WACO, TX 76707

DUE UPON RECEIPT

NOVEMBER 13, 2019
MATTER #: 118295.000001
INVOICE #: 3291081

FEES	\$	18,530.00
DISBURSEMENTS		3.80
INVOICE TOTAL	\$	18,533.80

Mailed Payments:

Dykema Gossett PLLC
Attn: Accounts Receivable
400 Renaissance Center
Detroit, MI 48243

Payment via Domestic Wire

Account Name: Dykema Gossett PLLC
Bank: Huntington National Bank
Bank Address: 41 S. High Street (OP47)
City, State, ZIP: Columbus, OH 43215
Routing Number: 044000024
Account Number: 01388425607
Reference _____ (Invoice #)

Dykema's Tax Id Number: 38-1446628

Payment via ACH

Account Name: Dykema General
Bank: Huntington National Bank
Bank Address: 41 S. High Street (OP47)
City, State, ZIP: Columbus, OH 43215
Routing Number: 072403473
Account Number: 01388425607
Reference _____ (Invoice #)

Payment via Foreign Wire

Account Name: Dykema Gossett PLLC
Bank: Huntington National Bank
Bank Address: 41 S. High Street (OP47)
City, State, ZIP: Columbus, OH 43215
Swift: HUNTUS33
Routing Number: 044000024
Account Number: 01388425607
Reference _____ (Invoice #)



400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

GRAYSON BROWN
NEIGHBORLY
1010 NORTH UNIVERSITY PARKS DRIVE
WACO, TX 76707

**STATEMENT OF ACCOUNT
DWYER FRANCHISING, LLC**

Account Balance As Of: November 13, 2019

Billing Attorney: VICTOR JOHNSON

Last Payment: December 6, 2019

Our Records Indicate the Following Invoices are Outstanding

MATTER ID: 118295.000001 PROTRADENET / PREDICTIVE PROFILES LAWSUIT - 2019-00216

Invoice	Date	Original Balance	Payments	Current Balance
3305743	01/29/2020	3,488.00	0.00	3,488.00
	Total	3,488.00	0.00	3,488.00

Current	31-60	61-90	91-120	OVER 120
0.00	0.00	0.00	0.00	0.00

PLEASE INCLUDE THIS STATEMENT AND REMIT TO:

Dykema Gossett PLLC
Attn: Accounts Receivable
400 Renaissance Center
Detroit, MI 48243
EIN# 38-1446628

FOR INQUIRIES, PLEASE CONTACT

Angelica Ballesteros
Accounts Receivable Specialist
210-554-5228
ABallesteros@dykema.com



400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

DUE UPON RECEIPT

GRAYSON BROWN
NEIGHBORLY
1010 NORTH UNIVERSITY PARKS DRIVE
WACO, TX 76707

NOVEMBER 13, 2019
MATTER #: 118295.000001
INVOICE #: 3291287

FOR PROFESSIONAL SERVICES RENDERED

RE: PROTRADENET / PREDICTIVE PROFILES LAWSUIT - 2019-00216

FEES	\$	39,676.00
DISBURSEMENTS		517.24
INVOICE TOTAL	\$	40,193.24



DWYER FRANCHISING, LLC
NOVEMBER 13, 2019

MATTER #: 118295.000001
INVOICE #: 3291287
PAGE 2

RE: PROTRADENET / PREDICTIVE PROFILES LAWSUIT - 2019-00216

DATE	ID	DESCRIPTION	HOURS
10/01/19	VCJ	WORK ON DRAFT FINDINGS OF FACT AND CONCLUSIONS OF LAW; WORK ON EXHIBITS FOR IP CLAIMS; CONSULT WITH CO-COUNSEL ON SAME.	2.30
10/03/19	VCJ	WORK ON PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW.	2.70
10/04/19	VCJ	WROK ON PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW; CONSULT WITH CO-COUNSEL ON SAME; WORK ON EXHIBIT LIST FOR IP CLAIMS.	6.50
10/14/19	VCJ	WORK ON TRIAL PREPARATIONS.	4.20
10/16/19	VCJ	WORK ON TRIAL PREPERATOINS	2.40
10/17/19	VCJ	WORK ON TRIAL PREPARATIONS.	3.80
10/18/19	VCJ	PREPARE FOR TRIAL.	5.30
10/18/19	VCJ	WORK ON TRIAL PREPARATIONS.	4.60
10/19/19	VCJ	WORK ON TRIAL PREPARATIONS.	3.80
10/20/19	VCJ	PREPARE FOR TRIAL; TRIP TO WACO.	9.20
10/21/19	VCJ	PREPARE FOR AND ATTEND TRIAL DAY 1; PREPARE FOR DAY TWO OF TRIAL.	15.40
10/29/19	VCJ	PREPARE FOR AND ATTEND TRIAL; RETURN TRIP TO DALLAS.	12.60
TOTAL HOURS			72.80
TOTAL			\$39,676.00



DWYER FRANCHISING, LLC
NOVEMBER 13, 2019

MATTER #: 118295.000001
INVOICE #: 3291287
PAGE 3

BILLING SUMMARY

ID	TIMEKEEPER	HOURS	RATES	AMOUNT
VCJ	VICTOR JOHNSON	72.80	545.00	39,676.00
	TOTAL	72.80		\$39,676.00



DWYER FRANCHISING, LLC
NOVEMBER 13, 2019

MATTER #: 118295.000001
INVOICE #: 3291287
PAGE 4

DISBURSEMENTS

DATE	DESCRIPTION	AMOUNT
10/22/19	VENDOR: VICTOR JOHNSON INVOICE#: 49045 DATE: 10/22/2019 HOTEL STAY DURING TRIAL	372.24
10/22/19	VENDOR: VICTOR JOHNSON INVOICE#: 49045 DATE: 10/22/2019 MILEAGE TO/FROM WACO FOR TRIAL	145.00
TOTAL DISBURSEMENTS		517.24



400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

GRAYSON BROWN
NEIGHBORLY
1010 NORTH UNIVERSITY PARKS DRIVE
WACO, TX 76707

DUE UPON RECEIPT

NOVEMBER 13, 2019
MATTER #: 118295.000001
INVOICE #: 3291287

FEES	\$	39,676.00
DISBURSEMENTS		517.24
INVOICE TOTAL	\$	40,193.24

Mailed Payments:

Dykema Gossett PLLC
Attn: Accounts Receivable
400 Renaissance Center
Detroit, MI 48243

Payment via Domestic Wire

Account Name: Dykema Gossett PLLC
Bank: Huntington National Bank
Bank Address: 41 S. High Street (OP47)
City, State, ZIP: Columbus, OH 43215
Routing Number: 044000024
Account Number: 01388425607
Reference _____ (Invoice #)

Dykema's Tax Id Number: 38-1446628

Payment via ACH

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Account Number: 01388425607
Reference _____ (Invoice #)

Payment via Foreign Wire

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Account Number: 01388425607
Reference _____ (Invoice #)



400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

GRAYSON BROWN
NEIGHBORLY
1010 NORTH UNIVERSITY PARKS DRIVE
WACO, TX 76707

**STATEMENT OF ACCOUNT
DWYER FRANCHISING, LLC**

Account Balance As Of: November 13, 2019

Billing Attorney: VICTOR JOHNSON

Last Payment: December 6, 2019

Our Records Indicate the Following Invoices are Outstanding

MATTER ID: 118295.000001 PROTRADENET / PREDICTIVE PROFILES LAWSUIT - 2019-00216

Invoice	Date	Original Balance	Payments	Current Balance
3305743	01/29/2020	3,488.00	0.00	3,488.00
	Total	3,488.00	0.00	3,488.00

Current	31-60	61-90	91-120	OVER 120
0.00	0.00	0.00	0.00	0.00

PLEASE INCLUDE THIS STATEMENT AND REMIT TO:

Dykema Gossett PLLC
Attn: Accounts Receivable
400 Renaissance Center
Detroit, MI 48243
EIN# 38-1446628

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400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

DUE UPON RECEIPT

GRAYSON BROWN
NEIGHBORLY
1010 NORTH UNIVERSITY PARKS DRIVE
WACO, TX 76707

JANUARY 29, 2020
MATTER #: 118295.000001
INVOICE #: 3305743

FOR PROFESSIONAL SERVICES RENDERED

RE: PROTRADENET / PREDICTIVE PROFILES LAWSUIT - 2019-00216

FEES	\$	3,488.00
INVOICE TOTAL	\$	3,488.00



DWYER FRANCHISING, LLC
JANUARY 29, 2020

MATTER #: 118295.000001
INVOICE #: 3305743
PAGE 2

RE: PROTRADENET / PREDICTIVE PROFILES LAWSUIT - 2019-00216

DATE	ID	DESCRIPTION	HOURS
12/05/19	VCJ	REVIEW TRIAL TRANSCRIPT AND UPDATE FINDINGS OF FACT AND CONCLUSIONS OF LAW	6.40
		TOTAL HOURS	6.40
		TOTAL	\$3,488.00



DWYER FRANCHISING, LLC
JANUARY 29, 2020

MATTER #: 118295.000001
INVOICE #: 3305743
PAGE 3

BILLING SUMMARY

ID	TIMEKEEPER	HOURS	RATES	AMOUNT
VCJ	VICTOR JOHNSON	6.40	545.00	3,488.00
	TOTAL	6.40		\$3,488.00



400 Renaissance Center • Detroit, MI 48243 • EIN# 38-1446628

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1010 NORTH UNIVERSITY PARKS DRIVE
WACO, TX 76707

DUE UPON RECEIPT

JANUARY 29, 2020
MATTER #: 118295.000001
INVOICE #: 3305743

FEES	\$	3,488.00
INVOICE TOTAL	\$	3,488.00

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Dykema Gossett PLLC
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400 Renaissance Center
Detroit, MI 48243

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